

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

DAVID SEAMAN,)	
)	
Plaintiff,)	
)	
v.)	CASE NO.: 3-18-cv-00833-HEH
)	
YOUTUBE, LLC and GOOGLE, LLC,)	
)	
Defendants.)	

**DEFENDANTS YOUTUBE, LLC’S AND GOOGLE LLC’S
MOTION TO TRANSFER OR, IN THE ALTERNATIVE, TO DISMISS**

Defendants YouTube, LLC and Google LLC (incorrectly sued as Google, LLC) (together “Defendants”), by counsel, respectfully move this Court to transfer this case to the Northern District of California pursuant to 28 U.S.C. § 1404(a) and the parties’ forum-selection agreement. In the alternative, Defendants seek dismissal of Plaintiff’s Complaint (Docket No. 1), pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6) for lack of personal jurisdiction, improper venue, based on YouTube’s immunity under Section 230(c)(1) and the First Amendment, and for failure to state a claim. Pursuant to this Court’s Electronic Case Filing Policies and Procedures as it relates to Multi-Part Documents with More Than One Motion for Relief, Defendants file this Motion twice as both a Motion to Transfer and a Motion to Dismiss. The text of the Motions is identical. The grounds for this motion are more fully set forth in Defendants’ Memorandum in Support, which accompanies this motion.

Dated: January 25, 2019

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*Counsel for Defendants YouTube, LLC and
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CERTIFICATE OF SERVICE

I certify that on the 25th day of January, 2019, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to the following:

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